

IN THE U.S. DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

APRIL BAYLIS, :
: .
Plaintiff, : .
: .
v. : C. A. No. 04-1462-KAJ
: .
RED LION GROUP, INC., a corporation of : .
the State of Pennsylvania, : .
: .
Defendant. : .

NOTICE OF RECORDS DEPOSITION*

To: Bayard Marin, Esquire
521 West Street
Wilmington, DE 19801

PLEASE TAKE NOTICE that the undersigned will take the records deposition* of the following persons on June 1, 2005 at 2:00 p.m. in the office of Marks, O'Neill, O'Brien & Courtney, P.C., 913 North Market Street, Suite 800, Wilmington, Delaware 19801:

Custodian of Records
Omega Medical Center
15 Omega Drive, Building K
Newark, DE 19713

Custodian of Records
First State Orthopaedics
Dr. Sowa
4745 Ogletown-Stanton Rd., Suite 225
Newark, DE 19713

Custodian of Records
Dr. Peter Michael Glowacki
2600 Glasgow Ave., Suite 124
Newark, DE 19702

Custodian of Records
Dr. John Douglas Patterson

701 N. Clayton St., Suite 600MSB
Wilmington, DE 19805

Zurich North America
P.O. Box 66944
Chicago, IL 60666-0944

/S/ Norman H. Brooks, Jr.

NORMAN H. BROOKS, JR., ESQUIRE
Marks, O'Neill, O'Brien & Courtney, P.C.
913 North Market Street, Suite 800
Wilmington, DE 19801
(302) 658-6538
Attorney for Defendant

DATED: May 11, 2005

*DUCES TECUM - Deponent is to bring with them all documents in their possession pertaining to **April Baylis**, including all physician's handwritten notes, typed office notes, patient information reports, diagnostic testing, prescriptions, billing ledgers, etc. Please do not bring with you or deliver any x-ray films, MRI films or other such films, but only written reports of such radiographic studies. **Deponent's appearance at the scheduled deposition will be waived if copies of the subpoenaed documents are furnished to Norman H. Brooks, Jr., Esquire on or before May 31, 2005.**